

American Broadband

1605 Washington Street • P.O. Box 400 • Blair, NE 68008

888.262.2661 • www.abbnebraska.com

REDACTED – FOR PUBLIC INSPECTION

Received & Inspected

JUL 03 2014

FCC Mail Room

June 27, 2014

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *In the Matter of ETC Annual Reports and Certifications, Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing a Unified Inter-carrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund, WC Docket Nos. 14-58, 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208*

Dear Ms. Dortch:

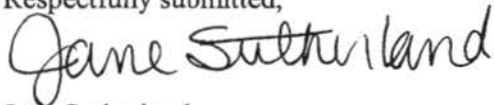
On behalf of Holway Telephone Company, please find enclosed two copies of Holway Telephone Company's FCC Form 481, along with the redacted versions of the Confidential Financial Information.

Also enclosed are copies of Holway Telephone Company's redacted five-year service quality improvement plan.

One copy of the FCC Form 481, containing Confidential Financial Information is being filed under separate cover.

Please do not hesitate to contact me at (402) 426-6242 if you have any questions regarding this submission.

Respectfully submitted,



Jane Sutherland
Customer Operations Manager
Holway Telephone Company

Encl.

No. of Copies rec'd 0+1
List ABOVE

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
OMB Control No. 3060-0086/OMB Control No. 3060-0819
July 2013

<010> Study Area Code	421929	Received & Inspected
<015> Study Area Name	HOLWAY TEL CO	
<020> Program Year	2015	JUL 09 2014
<030> Contact Name: Person USAC should contact with questions about this data	Jane Sutherland	
<035> Contact Telephone Number: Number of the person identified in data line <030>	4024266242 ext.	FCC Mail Room
<039> Contact Email Address: Email of the person identified in data line <030>	jsutherland@americanbb.com	

ANNUAL REPORTING FOR ALL CARRIERS

54,313 Completion Required	54,422 Completion Required
----------------------------------	----------------------------------

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	1.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> 421929mo510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> 421929mo610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)?	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

- <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

421929m0112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
 <114> Report how much universal service (USF) support was received
 <115> How (USF) was used to improve service quality
 <116> How (USF) was used to improve service coverage
 <117> How (USF) was used to improve service capacity
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

✓
✓
✓
✓
✓
✓

<010>	Study Area Code	421929
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<020>	Program Year	2015
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<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
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Page 3

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<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

[illegible]

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	421928
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

[illegible]

(800) Operating Companies
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

<810> Reporting Carrier Holway Telephone Company

<811>	Holding Company	RBJ Corp.
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<812>	Operating Company	Holway Telephone Company
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[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

<910> Tribal Land(s) on which ETC Serves

--

<920> Tribal Government Engagement Obligation

--

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- | | | |
|-------|--|----------------------------|
| <921> | Needs assessment and deployment planning with a focus on Tribal community anchor institutions. | Select
(Yes, No,
NA) |
| <922> | Feasibility and sustainability planning; | |
| <923> | Marketing services in a culturally sensitive manner; | |
| <924> | Compliance with Rights of way processes | |
| <925> | Compliance with Land Use permitting requirements | |
| <926> | Compliance with Facilities Siting rules | |
| <927> | Compliance with Environmental Review processes | |
| <928> | Compliance with Cultural Preservation review processes | |
| <929> | Compliance with Tribal Business and Licensing requirements. | |

Select (Yes, No, NA)

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421929
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<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

Please check this box to confirm no terrestrial backhaul
<1120> options exist within the supported area pursuant to § 54.313(G)



Please check this box to confirm the reporting carrier offers
<1130> broadband service of at least 1 Mbps downstream and 256 kbps
upstream within the supported area pursuant to § 54.313(G)



(1200) Terms and Condition for Lifeline Customers**Lifeline****Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421929
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<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024246242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

421929mo1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,



<1222> Details on the number of minutes provided as part of the plan,



<1223> Additional charges for toll calls, and rates for each such plan.



(2000) Price Cap Carrier Additional Documentation**Data Collection Form***Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421929
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<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010> 2nd Year Certification {47 CFR § 54.313(b)(1)}
 <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)}

☐
☐
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

<2012> 2013 Frozen Support Certification
 <2013> 2014 Frozen Support Certification
 <2014> 2015 Frozen Support Certification
 <2015> 2016 and future Frozen Support Certification

☐
☐
☐
☐
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification Support Used to Build Broadband

☐
Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017> 3rd year Broadband Service Certification
 <2018> 5th year Broadband Service Certification
 <2019> Interim Progress Certification

☐
☐
☐

<2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☐

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation
Data Collection Form

FCC Form 481

OMB Control No: 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 421929
 <015> Study Area Name HOLWAY TEL CO
 <020> Program Year 2015
 <030> Contact Name - Person USAC should contact regarding this data Jane Sutherland
 <035> Contact Telephone Number - Number of person identified in data line <030> 4024266242 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> jsutherland@americanbb.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan
 Milestone Certification [47 CFR § 54.313(f)(1)(i)]

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- (3012) Community Anchor Institutions [47 CFR § 54.313(f)(1)(ii)]

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier [47 CFR § 54.313(f)(2)]
 (3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ ☒
 (Yes/No) ☒ ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☐
 (3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☐

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, Is your company audited?
 If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(Yes/No) ☒ ☒

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications ☒

- (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows ☒

- (3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. ☒

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

- (3023) Underlying information subjected to a review by an independent certified public accountant ☐

- (3024) Underlying information subjected to an officer certification. ☐

- (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

421929mo3026.pdf

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	421929
<015> Study Area Name	HOLWAY TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035> Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: HOLWAY TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/27/2014
Printed name of Authorized Officer: Joe Jetenaky	
Title or position of Authorized Officer: President	
Telephone number of Authorized Officer: 4024266200 ext.	
Study Area Code of Reporting Carrier: 421929	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	421929
<015> Study Area Name	HOLWAY TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035> Contact Telephone Number - Number of person identified in data line <030>	4024256242 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Holway Telephone Company

Certification of Compliance with Applicable Service Quality Standards and Consumer Protection Rules for Voice and Broadband Services

Service quality standards and consumer protection rules for broadband are not as defined as the rules for voice services. The Company complies with any service quality standards and consumer protection rules for broadband that are out there now and any that will be defined in the future.

Service Quality Standards

For voice services, the Company:

- Provides voice grade access to the public switched network.
- Provides flat rated local exchange service with no additional charge to end users.
- Provides access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911.
- Provides toll blocking and toll limitation services.

For voice and broadband services, the Company:

- Advertises the availability of its services and the charges using media of general distribution and/or on its website.
- Maintains a business office providing customers with access to a customer service representative either in person or via a local telephone call or toll-free telephone number during business hours.
- Directs after hour calls to the Company's help desk.
- Directs trouble reports to the on-call technician.
- Tracks all service orders to ensure they are completed in a timely manner.
- Measures its service connection and service interruption performance on a regular basis.
- Trains employees to:
 - Answer all incoming calls promptly.
 - Respond to all inquiries for information promptly and courteously.
 - Investigate thoroughly all customer complaints and handle appropriately according to the Company's guidelines for resolution of customer complaints.
 - Be knowledgeable about products and service offerings so they can assist the customer with selecting the best service option.
- Has a process for periodic inspection, testing and preventive maintenance of its equipment to permit the rendering of safe, adequate and continuous service at all times.
- Meets or exceeds the standards established by the state commission and provides any reports required in accordance with the state commission's rules.

Consumer Protection Rules

The Company has established operating procedures designed to facilitate compliance with applicable consumer protection rules which include compliance with the Customer Proprietary Network Information (CPNI) rules. The operating procedures include:

- Appointment of a compliance officer.
- A manual detailing the specific procedures for protecting consumer information.
- Employee training on an annual basis.
- A disciplinary process for improper use of consumer information.

If complaints are filed with the Company regarding consumer protection rules, the complaint is immediately investigated, the matter tracked and any corrective action noted. This process ensures that problems are addressed and corrections made.

**Holway Telephone Company
KLM Telephone Company**

Functionality in Emergency Situations

Back-Up Power

Both Rich Hill and Maitland switches have 7-8 hours of battery backup. Both have a fixed generator with auto startup that will carry the total electrical load of the building. CO's in Skidmore, Metz, Deerfield, and Richards are designed with 7-8 hours of battery backup but do not have a fixed generator. We have portable generators to backup the batteries. All DLC's are for 5-6 hours of battery backup. We have portable generators as a backup to the batteries in the DLC's.

Rerouting of Traffic around Damaged Facilities

The Rich Hill switch's toll traffic routes to BlueBird Networks by fiber which is redundant and diverse. Maitland switch's toll traffic routes to CenturyLink by fiber which is redundant. Each DLC has a working fiber circuit with a hot standby. The same local loop serves both the voice and broadband service to the subscriber.

Traffic Spikes

Our DLC's are designed with a 4:1 concentration ratio to our switches. Trunk capacity to BlueBird Network and CenturyLink Network is set by high busy hour traffic capacity. The switches in Rich Hill and Maitland are non-blocking. The broadband pipe to the world includes enough capacity to carry 20% more data than at peak usage times.

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	421929
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<015>	Study Area Name	HOLWAY TEL CO
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<020>	Program Year	2015
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<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
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<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
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<039> Contact Email Address - Email Address of person identified in data line <030> jsutherland@americanbb.com

<701> Residential Local Service Charge Effective Date

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421929
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<015>	Study Area Name	HOIWAY TRI. CO
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<020>	Program Year	2015
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<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
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<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com
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<711> <a1> <a2> <b1> <b2> <c> <d1> <d2> <d3> <d4>

[illegible]

(800) Operating Companies

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421929
<015>	Study Area Name	HOLWAY TEL CO.
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Jane Sutherland
<035>	Contact Telephone Number - Number of person identified in data line <030>	4024266242 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jsutherland@americanbb.com
<810>	Reporting Carrier	Holway Telephone Company
<811>	Holding Company	RBH Corp.
<812>	Operating Company	Holway Telephone Company

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Cameron Telephone Company, LLC (LA)	270425	Cameron Communications
	Cameron Telephone Company, LLC (TX)	440425	Cameron Communications
	Elizabeth Telephone Company, LLC	270430	Cameron Communications
	LBH, LLC	279014	Cameron Communications
	Interior Telephone Company	613013	TelAlaska
	Mukluk Telephone Company, Inc.	613016	TelAlaska
	TelAlaska Cellular Inc.	619013	
	K.I.M. Telephone Company	421900	American Broadband
	Arlington Telephone Company	371517	
	The Blair Telephone Company	371524	
	Eastern Nebraska Telephone Company	371542	
	Rock County Telephone Company	371586	
	HunTel Cablevision Inc.	379016	HunTel Communications
	AMA Communications, LLC	449020	
	Dialog Telecommunications, Inc. (KY)	269011	
	Dialog Telecommunications, Inc. (MS)	289012	
	Cameron Communications, LLC		Cameron Communications
	N.W. Communications Co.		American Broadband
	TelAlaska Long Distance, Inc.		TelAlaska Networks

Holway Telephone Company

Lifeline Assistance Program Terms and Conditions

Lifeline Assistance Eligibility

The LIFELINE ASSISTANCE PROGRAM and the DISABLED PROGRAM are plans which assist qualified low-income applicants with reductions in their monthly local exchange service rate. The applicant applies for a single telephone line at the applicant's principal place of residence. The Lifeline Program is limited to one benefit per household, consisting of either wireline or wireless service. Lifeline is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program. Qualified applicants of LIFELINE shall have their monthly local exchange service rate reduced by the federal support of \$9.25, in addition to the state support of \$3.50. Qualified applicants of the DISABLED program are eligible for state support of \$3.50. Eligibility is reviewed annually. To establish continued eligibility, Lifeline subscribers will need to submit an annual recertification form signed under penalty of perjury that you still participate in a qualifying program or meet the income-based eligibility threshold. Your benefits will be discontinued when you no longer meet the requirements or when the annual recertification form is not received. Customers who are no longer eligible for Lifeline benefits must notify their service provider.

To be eligible for LIFELINE, an applicant must participate in one of the following:

- MO HealthNet (f/k/a Medicaid)
- Supplemental Nutrition Assistance (Food Stamps)
- Supplemental Security Income
- Low-Income Home Energy Assistance (LIHEAP)
- Federal Public housing Assistance (Section 8)
- National School Free Lunch Program
- Temporary Assistance for Needy Families (TANF)
- 135% of the Federal Poverty Level

To be eligible for the DISABLED program, an applicant must participate in one of the following:

- Veteran Administration Disability Benefits
- State Blind Pension
- State Aid to Blind Persons
- State Supplemental Disability Assistance
- Federal Social Security Disability
- Federal Supplemental Security Income

Applications are available by contacting Holway Telephone Company at 888-438-4490.

Numbers of Minutes-of-Use Provided as Part of Lifeline Program Service

Holway Telephone Company's Voice lifeline service includes unlimited local minutes-of-use within the toll-free calling area. Holway's Voice Lifeline Plan does not include any free minutes-of-use for toll. Toll is billed at the standard toll rate depending on which interexchange carrier the consumer subscribes to for toll service. As part of the Lifeline service, Toll blocking is available to eligible consumers at no cost.

Rates

Subscribers may receive the Lifeline credit on any type or grade of local service, including bundled services that are normally offered by Holway Telephone Company. Advertised rates do not include any applicable taxes or surcharges.

Recertification of Lifeline Eligibility

Lifeline recipients are required to recertify their eligibility annually. Failure to properly recertify a recipient's continued eligibility for Lifeline will result in termination of the Lifeline recipient's monthly Lifeline discount and de-enrollment from Lifeline.

Additional Lifeline Program Information

Lifeline is limited to one benefit per household, consisting of either wireline or wireless service. A household is defined as an individual or group of individuals who live together at the same address and share income and expenses. Lifeline is a government benefit program, and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

Contact Holway Telephone Company at 888-438-4490 for additional information on the Lifeline program or for an application.

REDACTED - FOR PUBLIC INSPECTION

HOLWAY TELEPHONE COMPANY (421929)

ATTACHMENT – LINE 3019-3021

ATTACHMENT REDACTED IN ENTIRETY

JUL 03 2014

REDACTED FOR PUBLIC INSPECTION

FCC Mail Room 5 Year Plan Narrative

Holway Telephone Company

Pursuant to 47 C.F.R. 54.202(a)(1)(ii), Holway Telephone Company submits a five-year plan that describes with specificity proposed improvements or upgrades to its network throughout its proposed service area. Holway Telephone Company also provides estimates regarding the area and population that will be served as a result of the improvements. This plan is based on Holway Telephone Company's current business and financial conditions and is subject to change as a result of changes in those conditions.

Pursuant to 47 C.F.R. 54.313, in each subsequent year, Holway Telephone Company will file a progress report on its five-year service quality improvement plan pursuant to 54.202(a), including maps detailing its progress towards meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve service quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled in the prior calendar year.

██████████ exchange:

As of January 1, 2014, approximately █% or █ households in the ██████████ exchange have access to broadband Internet service through Holway Telephone Company's fiber optic or copper facilities. Subscribers served by these facilities have access that meets or exceeds the 4/1 Mbps standard. No capital improvements are required for those subscribers meeting the 4/1 Mbps standard other than maintenance of facilities and as such, no capital investment to these subscribers is outlined in this plan. The █% or █ households in the ██████████ exchange who do not have broadband Internet service meeting the 4/1 Mbps standard, will be provided service at the 4/1 Mbps standard through proposed improvements or upgrades to the network at the end of calendar year 2019. See the attached template for capital improvements by year.

██████████ exchange:

As of January 1, 2014, approximately █% or █ households in the ██████████ exchange have access to broadband Internet service through Holway Telephone Company's fiber optic or copper facilities. Subscribers served by these facilities have access that meets or exceeds the 4/1 Mbps standard. No capital improvements are required for those subscribers meeting the 4/1 Mbps standard other than maintenance of facilities and as such, no capital investment to these subscribers is outlined in this plan. The remaining █% or █ households in the ██████████ exchange who do not have broadband Internet service meeting the 4/1 Mbps standard, will be provided service at the 4/1 Mbps standard through proposed improvements or upgrades to the network at the end of calendar year 2019. See the attached template for capital improvements by year.

In addition to the capital improvements planned, Holway Telephone Company incurred approximately \$[REDACTED] in depreciation expense and \$[REDACTED] in on-going maintenance and operating expenses in calendar year 2013. It is reasonable to expect depreciation, maintenance, and operating expenses for the 2015 through 2019 calendar years.

Five Year Plan
Holway Telephone Company
exchange

REDACTED FOR PUBLIC INSPECTION

Year #		Planned Dollar Amount Capital Improvement (CAPx)	Estimated # of Square Miles Served by Capital Improvement	Estimated Population Served By Capital Improvement	Depreciation Expense Associated with Network Improvements Years 1 through 5	Depreciation Expense Associated with Network Improvements for Years Prior to Year 1	On-going Maintenance/ Operating Expense
	Existing Expense- Total Company	x	x	x	x		
1	01/01/2015 to 12/31/2015					x	x
2	01/01/2016 to 12/31/2016					x	x
3	01/01/2017 to 12/31/2017					x	x
4	01/01/2018 to 12/31/2018					x	x
5	01/01/2019 to 12/31/2019					x	x

Holway plans \$ in capital upgrades in Year 4, resulting in an additional \$ depreciation expense.

Depreciation expense for Holway was approximately \$ in 2013.

On-going operating expenses excluding depreciation expense was approximately \$ for KLM in 2013.

Five Year Plan

Holway Telephone Company

Exchange

REDACTED FOR PUBLIC INSPECTION

Year #		Planned Dollar Amount Capital Improvement (CAPx)	Estimated # of Square Miles Served by Capital Improvement	Estimated Population Served By Capital Improvement	Depreciation Expense Associated with Network Improvements Years 1 through 5	Depreciation Expense Associated with Network Improvements for Years Prior to Year 1	On-going Maintenance/ Operating Expense
	Existing Expense- Total Company	x	x	x	x		
1	01/01/2015 to 12/31/2015					x	x
2	01/01/2016 to 12/31/2016					x	x
3	01/01/2017 to 12/31/2017					x	x
4	01/01/2018 to 12/31/2018					x	x
5	01/01/2019 to 12/31/2019					x	x

Holway plans \$ in capital upgrades in Year 5, resulting in an additional \$ depreciation expense.

Depreciation expense for Holway was approximately \$ in 2013.

On-going operating expenses excluding depreciation expense was approximately \$ for KLM in 2013.